UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

FEDERAL TRADE COMMISSION,))
Plaintiff,	CIVIL ACTION NO. 04-CV-11136-GAO
v.	
DIRECT MARKETING CONCEPTS, INC., et al.,	
Defendants.)))

ASSENTED-TO MOTION TO EXTEND TIME FOR DMC DEFENDANTS TO RESPOND TO PLAINTIFF'S MOTION TO STRIKE AFFIDAVITS

Defendants Direct Marketing Concepts, Inc., ITV Direct, Inc., and Donald Barrett ("DMC Defendants") hereby move this Court for a seven (7) day extension of time to respond to the Plaintiff Federal Trade Commission's ("FTC") Motion to Strike Affidavits Submitted by Defendants in Support of Their Oppositions to Plaintiff's Motion for Summary Judgment in the above-captioned action. As grounds for this motion, DMC Defendants state as follows:

- 1. On March 3, 2006, FTC filed its Motion to Strike Affidavits Submitted by Defendants in Support of Their Oppositions to Plaintiff's Motion for Summary Judgment. In support of its motion, the FTC filed a brief in excess of 40 pages.
- 2. Responding to the legal and factual issues raised in the Motion to Strike

 Affidavits will require investigation and preparation of several documents, including affidavits, a

 counterstatement of facts and a memorandum of law.
- The response to the Motion to Strike Affidavits is currently due on March 17,
 2006.

4. Counsel for DMC Defendants has conferred with FTC's Counsel, Edward Glennon, and Attorney Glennon has consented to the proposed extension of time.

WHEREFORE, DMC Defendants respectfully request that this Court allows their motion to extend the time in which to file its response to FTC's Motion to Strike Affidavits, up to and including Friday, March 24, 2006.

Dated: March 15, 2006

Respectfully submitted, DIRECT MARKETING CONCEPTS, INC., ITV DIRECT, INC., and DONALD BARRETT

By their attorney(s),

/s/ Christopher Robertson

Peter S. Brooks, BBO #058980 Christopher F. Robertson, BBO #642094 Susan W. Gelwick, BBO #567115

SEYFARTH SHAW LLP Two Seaport Lane, Suite 300

Boston, MA 02210-2028 Telephone: (617) 946-4800 Telecopier: (617) 946-4801

- 2 -